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*Attorney for Plaintiff*  
*Brixham Solutions, Ltd.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**BRIXHAM SOLUTIONS LTD.**, a British  
Virgin Islands International Business Company,

**Plaintiff,**

**v.**

**JUNIPER NETWORKS, INC.**, a Delaware  
Corporation,

**Defendant.**

**No. CV 13-00616 JCS**

**PLAINTIFF'S RESPONSE TO  
DEFENDANT'S AMENDED  
COUNTERCLAIMS**

**Complaint Filed: February 12, 2013**

Plaintiff, Brixham Solutions, Ltd. ("Brixham") hereby responds to the amended counterclaims of defendant, Juniper Networks, Inc. ("Juniper"), as follows:

**THE PARTIES**

45. Admitted.

46. Admitted.

47. Admitted that Brixham is accusing Juniper of infringing the '895, '621, '652 and '916 patents. Brixham, as the non-burdened party, also contends that such patents are not invalid and not unenforceable.

**JURISDICTION AND VENUE**

48. Admitted.

49. Admitted.

50. Admitted.

51. Admitted.

**BACKGROUND**

52. Admitted.

53. Admitted.

54. Admitted.

**FIRST COUNTERCLAIM**

55. Brixham realleges and incorporates herein by reference the allegations and responses contained in the foregoing paragraphs.

56. Admitted.

57. Denied.

58. Admitted that Juniper seeks a declaration of non-infringement. Denied that it is entitled to such declaration.

**SECOND COUNTERCLAIM**

59. Brixham realleges and incorporates herein by reference the allegations and responses contained in the foregoing paragraphs.

60. Admitted.

61. Denied.

62. Admitted that Juniper seeks a declaration of invalidity. Denied that it is entitled to such declaration.

**THIRD COUNTERCLAIM**

63-104. Brixham responds that it has filed a motion to dismiss this counterclaim for failure to provide the requisite specificity pursuant to Fed. R. Civ. P. 9(b).

Respectfully submitted,

Dated: December 10, 2013

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**CERTIFICATE OF SERVICE**

I declare under penalty of perjury under the laws of the United States that on December 10, 2013, a true and correct copy of the foregoing PLAINTIFF'S RESPONSE TO DEFENDANT'S AMENDED COUNTERCLAIMS was served in accordance with Rule 5, Federal Rules of Civil Procedure on the following counsel of record in the manner indicated:

**Via CM/ECF**

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